REMARKS

Claims 1 to 3 were pending in the application at the time of examination. Claims 1 to 3 stand rejected as obvious.

Applicants note that the assignee for the above application has transferred responsibility for the application to the undersigned attorney. <u>Please address all future correspondence in the above application to the undersigned attorney.</u> A revocation of attorney and appointment of new attorney will be filed under separate cover.

Applicants have amended the description to correct grammatical errors.

Claims 1 to 3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,706,427, hereinafter referred to as Tabuki, in view of European Patent Application Publication EP 1 089 516 A2, hereinafter Grandcolas. The Examiner stated, in part (emphasis in original):

> . . . Tabuki discloses *a method for enhanced quality of identification in a data communication network* (Tabuki teaches in summary a method for authenticating users on networks that includes an application server that requests a user host to send authentication data to a verification server) [see Tabuki, abstract, Col. 2, lines 24-39], *the method comprising: obtaining a user identifier, said user identifier comprising an identification server ID* (verification server name) (Tabuki teaches utilizing a Sys Uniq Key which is a system key assigned to each user, and is unique in the verification server's table. As well as utilizing the user's Sys Uniq Key, the system of Tabuki further teaches this key is utilize [Sic] in combination with the verification server name), [see Tabuki, Col. 5, lines 30-60 and Col. 6, lines 23-27], *said identification server ID identifying an identification server peer group* (Tabuki further teaches utilizing the verification server's name in addition to the Sys Uniq key when there is a plurality of different verification servers), [see Tabuki, Col. 6, lines 4-38],

However, Tabuki taught:

> Therefore, strictly speaking, identification of the user is made on the basis of the combination of Sys Uniq Key and verification server name.

Tabuki, Col. 6, lines 25 to 27.

Thus, while the Examiner continues to attempt to equate the identification server peer group of Claim 1 with the combination of Tabuki's verification server name and the Sys Uniq key, Tabuki's verification server name, either alone or in combination with a Sys Uniq key, does not identify an identification server peer *group*. Rather, the combination of verification server name and Sys Uniq key in Tabuki, as quoted above, uniquely identifies a user where multiple verification servers are used. Applicants respectfully submit that teaching using a verification server name and a Sys Uniq key to identify a particular user when there is more than one verification server fails to suggest or disclose an ID that identifies an identification server peer *group*.

The rejection continued:

> . . . (Tabuki teaches that a verification servers have an internal database with identification data and valid authentication data of user hosts (user authentication peer group)), [see Tabuki, Col. 4, lines 22-35, Col. 5, lines 21-38]; . . . *configured to search for one or more matching entries* (Tabuki teaches that authentication data of the user is sent to a verification server, in which the verification server matches authentication data of the user by searching within a relational database), [see Tabuki, Col. 3, lines 5-22 and Col. 4, lines 33-45]

Thus, the rejection admits that a verification server, or server group includes both the identification and authentication functions.

As interpreted by the rejection, Tabuki teaches a method for authenticating users on a network where a verification server performs *both* identification and authentication

functions. In contrast, Claim 1 recites an *identification* server peer group to perform identification functions and a separate user *authentication* peer group to perform user authentication functions. Thus, the rejection itself shows that Tabuki teaches away for the two server groups as recited in Claim 1. The MPEP stated:

> A *prima facie* case of obviousness may also be rebutted by showing that the art, in any material respect, teaches away from the claimed invention.

MPEP §2144.05, Eighth Ed., Rev. 2, p. 2100-143 (May 2004)

The Examiner next stated (Emphasis in original):

> . . . Tabuki does not explicitly disclose an identification randomized Id and a mapping between an identification randomized ID and a user authentication peer group capable of authenticating a user associated with a particular randomized ID, and a mapping between said identification randomized ID and user information.

> . . . Grandcolas discloses (e.g., method and system for single sign on user access to multiple web servers. [Sic] Grandcolas discloses *an identification randomized Id and a mapping between an identification randomized ID and a user authentication peer group capable of authenticating a user associated with a particular randomized ID, and a mapping between said identification randomized ID and user information* [see Grandcolas, page 4, lines 14-44].

Applicants first note that even if the rejection's interpretation of Grandcolas is correct and the combination of references is correct, the additional information does not overcome the deficiencies of the primary reference as noted above. Therefore, Claim 1 distinguishes over the combination of references.

Further, Applicants respectfully submit that the cited section of Grandcolas fails to teach or suggest an "identification randomized ID." Grandcolas fails to suggest or

teach anything concerning a randomized ID in the cited section and instead taught "an authentication token . . . comprising user identification data . . . and expiration time data . . . user identification data comprising a customer identification number that uniquely identifies the user to the secondary server. Similarly, Tabuki taught "The Sys Uniq Key is a system key assigned to each user and is unique. . ." Accordingly, the secondary reference adds nothing to the primary reference and instead confirms that those of skill did not consider a randomized ID. In, particular, a user identification number that uniquely identifies the user in Grandcolas and the Sys Uniq Key in Tabuki show that those of skill in the did not consider a randomized ID necessary, and teach away from such a feature. Accordingly, Grandcolas fails to correct the admitted shortcoming in the primary reference.

Finally, the motivation cited by the Examiner for combining the two references is not supported by the references. Tabuki stated:

> By establishing on the network, separate from the application server 10, a verification server 30 to perform verification processes, each application server 10 is freed from the need to keep valid authentication data for the authentication of user hosts 20 and the need to have functions for verification. Further, although only one application server 10 is shown in FIG. 1, it is also suitable to establish a plurality of application servers 10 on the network, consigning the verification processes for all application servers 10 to a single verification server 30, thereby combining the redundant authentication data verification functions for the plurality of application servers 10 and allowing for the efficient use of resources. (Emphasis Added.)

Tabuki, Col. 3, lines 55 to 67.

Thus, Tabuki taught that only a single verification was needed for multiple application servers. Therefore, contrary to the Examiner's stated motivation, Tabuki already taught this

functionality and so there would be no need to go to
Grandcolas. The motivation for the combination is provided by
the primary reference and so there is no motivation to modify
the primary reference using the stated motivation.

Applicants have demonstrated that cited portions of the
primary reference fail to teach or suggest several aspects of
Applicants' invention; the secondary reference confirms the
teaching of the primary reference and fails to teach or suggest
elements of Applicants' invention; and the motivation given for
the combination of references is contradicted by the primary
reference. Any one of these showing is sufficient to overcome
the obviousness rejection of Claim 1. Accordingly, Applicants
request reconsideration and withdrawal of the obviousness
rejection of Claim 1.

Claim 2 is a program storage device corresponding to
method Claim 1 and thus includes substantially the same
distinctive feature as Claim 1. Claim 3 is a means-plus-
function claim corresponding to method Claim 1 and thus
includes substantially the same distinctive feature as Claim 1.
Accordingly, the above comments with respect to Claim 1 are
incorporated herein by reference for Claims 2 and 3.
Applicants request reconsideration and withdrawal of the
obviousness rejection of each of Claims 2 and 3.

Claims 1 to 3 remain in the application. For the
foregoing reasons, Applicant(s) respectfully request allowance
of all pending claims. If the Examiner has any questions
relating to the above, the Examiner is respectfully requested
to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING
I hereby certify that this correspondence is
being deposited with the United States Postal
Service with sufficient postage as first class
mail in an envelope addressed to: Commissioner
for Patents, P.O. Box 1450, Alexandria, VA
22313-1450, on **October 18, 2004**.

_____   **October 18, 2004**
Attorney for Applicant(s)   Date of Signature

Respectfully submitted,

Forrest Gunnison
Attorney for Applicant(s)
Reg. No. 32,899
Tel.: (831) 655-0880